

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MERCHANT MEDIA, LLC and ALLSTAR :
MARKETING GROUP, LLC, : **Index No.: 05 CV 2817 (JES)**
:
Plaintiffs, : **NOTICE OF MOTION**
:
v. :
H.S.M. INTERNATIONAL, HESH MIRPURI, :
MEDIA BRANDS WORLDWIDE LIMITED and :
SANJAY MIRPURI. :
:
Defendants. :
----- -x

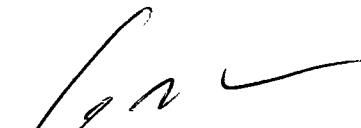
PLEASE TAKE NOTICE, that upon the annexed Declaration of Adam M.

Cohen dated July 22, 2005 and the exhibits annexed thereto, the Affidavit of Stu Berger duly sworn to on July 19, 2005 and the exhibits annexed thereto, the Affidavit of Ellin Gorky duly sworn to on July 19, 2005 and the exhibits annexed thereto, the Affidavit of Sean Cohen duly sworn to on July 19, 2005 and the exhibits annexed thereto, the accompanying Memorandum of Law, and upon all prior proceedings heretofore had herein, Plaintiffs Merchant Media, LLC and Allstar Marketing Group, LLC, shall move this Court, pursuant to Rule 55 of the Federal Rules of Civil Procedure, before the Honorable John E. Sprizzo, at 40 Centre Street, Courtroom 706, New York, New York 10007, on the 26th day of September 2005, for an order directing the entry of a default judgment in favor of the Plaintiffs and against Defendants H.S.M. International, Hesh Mirpuri, Media Brands Worldwide Limited and Sanjay Mirpuri (collectively "Defendants") in accordance with the form of Default Judgment being submitted herewith and ordering an inquest to determine appropriate money damages upon the ground that Defendants have failed to answer or otherwise move with respect to the Complaint.

Opposition papers, if any, shall be served on Plaintiffs' counsel no later than August 22, 2005.

Dated: New York, New York
July 22, 2005

KANE KESSLER, P.C.

By: 

Adam M. Cohen (AMC-9918)
1350 Avenue of the Americas
New York, NY 10022
(212) 541-6222

COLEMAN SUDOL & SAPONE, P.C.
R. Neil Sudol (RNS-5933)
950 Third Avenue, 11th Floor
New York, New York 10019

*Attorneys for Plaintiffs Merchant Media, LLC and
Allstar Marketing Group, LLC*

TO: **H.S.M. International**
Unit C – 15th floor
Kee Shing Centre
74-76 Kimberley Road
Tsim Sha Tsui, Kowloon
HONG KONG

Hesh Mirpuri
Unit C – 15th floor
Kee Shing Centre
74-76 Kimberley Road
Tsim Sha Tsui, Kowloon
HONG KONG

Media Brands Worldwide Limited
15A, Kam Wing Commercial Building
28-30 Minden Avenue
Tsim Sha Tsui, Kowloon
HONG KONG

Sanjay Mirpuri
15A, Kam Wing Commercial Building
28-30 Minden Avenue
Tsim Sha Tsui, Kowloon
HONG KONG

Fame Concept F & C Consultants Limited
15/F, CRE Building
303 Hennessy Road
Wanchai
HONG KONG

This document has been filed electronically.

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
) ss.:
COUNTY OF NEW YORK)

I, **SANDRA AYALA**, being duly sworn, say:

I am not a party to the within action, am over 18 years of age, and reside at Levittown, New York.

On July 22, 2005, I served the within:

**NOTICE OF MOTION
DEFAULT JUDGMENT
DECLARATION OF ADAM COHEN DATED JULY 22, 2005
AFFIDAVIT OF ELLIN GORKY SWORN TO JULY 19, 2005
AFFIDAVIT OF SEAN COHEN SWORN TO JULY 19, 2005
AFFIDAVIT OF STU BERGER SWORN TO JULY 19, 2005
MEMORANDUM OF LAW IN SUPPORT**

by delivering a true copy thereof, by airmail, addressed to the following:

H.S.M. International
Unit C – 15th floor
Kee Shing Centre
74-76 Kimberley Road
Tsim Sha Tsui, Kowloon
HONG KONG

Hesh Mirpuri
Unit C – 15th floor
Kee Shing Centre
74-76 Kimberley Road
Tsim Sha Tsui, Kowloon
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Tsim Sha Tsui, Kowloon
HONG KONG

Fame Concept F & C Consultants Limited
15/F, CRE Building
303 Hennessy Road
Wanchai
HONG KONG


SANDRA AYALA

Sworn to before me this
22nd day of July, 2005



Notary Public

BRUCE M. SCHLOSS
Notary Public, State of New York
No. 31-4734625
Qualified in Westchester County
Commission Expires May 31, 2006